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7 Attorneys for Defendant,
ANDRES LOPEZ erroneously sued as
8 ANDY LOPEZ

9
10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA

12
13 BRANDY OLMSTED,
14 Plaintiff,
15 v.
16 FOUNDATION PARTNERS GROUP,
LLC, a Delaware Corporation; ANDY
17 LOPEZ, an Individual, inclusive,
18 Defendants.

Case No: 2:21-CV-01547-MCE-DMC
*[Honorable Morrison C. England, Jr.,
Courtroom 7]*
(Related Cases)

**STIPULATION REGARDING DEADLINES
AND ORDER**

Complaint Filed: August 27, 2021
Trial Date: None Set

20
21 GENE PAUL NELSON, NICOLE
NELSON
22 Plaintiff,
23 v.
24 FOUNDATION PARTNERS GROUP,
LLC, A Delaware Corporation, ANDY
25 LOPEZ, An Individual, inclusive, and
DOES 1 through 50, INCLUSIVE,
26 Defendants.

Case No. 2:21-cv-01738-MCE-DME

Complaint Filed: September 24, 2021
Trial Date: None Set

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1 WHEREAS, on October 13, 2022, Defendant ANDRES LOPEZ, erroneously
2 sued as ANDY LOPEZ (“Lopez”) filed Renewed Motions to Stay the Civil Action Pending
3 Resolution of the Criminal Proceedings (“Motions to Stay”) in the Related Cases.

4 WHEREAS, on December 6, 2022, after receipt of the Joint Request for Ruling
5 on Requests for Scheduling Order in Nelson Action, Modification of Scheduling Order
6 in Olmsted Action, and Stipulation on Deadlines, this Court issued Orders setting dates
7 and deadlines in the Related Cases as follows:

8 Fact Discovery completed within 9 months from this Court's
9 ruling on the Renewed Motion for Stay in both actions.
10 Designation of Expert Witnesses due within 60 days after the
11 close of fact discovery in both the Nelson Action and the
12 Olmsted Action. Rebuttal Expert Witnesses due by 30 days
13 after the designation of expert witnesses in both the Nelson
14 Action and the Olmsted Action. Expert discovery completed
by 120 days after expert witnesses are designated in the
Nelson Action and the Olmsted Action. Dispositive motions
due within 180 days after the close of fact discovery in the
Nelson Action and the Olmsted Action.

15 WHEREAS, on February 6, 2023, Lopez filed Notices of Withdrawal of the
16 Motions to Stay. Therefore, no rulings will be issued with respect to the Motions to Stay
17 to trigger the deadlines referenced in this Court's Orders, dated December 6, 2022.

18 IT IS HEREBY STIPULATED and agreed by and between Plaintiffs BRANDY
19 OLMSTED, GENE PAUL NELSON, and NICOLE NELSON, and Defendant
20 FOUNDATION PARTNERS GROUP, LLC, and Lopez, by and through their respective
21 counsel of record, as follows:

- 22 1. Fact Discovery in both cases shall be completed within 9 months from the
23 date the Court signs an Order on this Stipulation Regarding Deadlines;
- 24 2. Designation of Expert Witnesses shall be due within 60 days after the
25 close of fact discovery;
- 26 3. Rebuttal Expert Witnesses shall be due by 30 days after the designation
27 of expert witnesses;

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1 4. Expert discovery shall be completed by 120 days after expert witnesses
2 are designated; and
3 5. Dispositive motions shall be due within 180 days after the close of fact
4 discovery.

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6 FISHER & PHILLIPS LLP

7 Dated: March 10, 2023

8 By: /s/ Collin D. Cook
9 Collin D. Cook
10 Amaris M. Stich
11 Attorneys for Defendant
12 ANDRES LOPEZ erroneously sued as
13 ANDY LOPEZ

14

15 THE VELEZ LAW FIRM, PC

16 Dated: March 10, 2023

17 By: /s/ Mark P. Velez
18 Mark P. Velez
19 Natalya V. Grunwald
20 Attorneys for Plaintiff
21 BRANDY OLMSTED, GENE PAUL
22 NELSON, AND NICOLE NELSON

23

24 JACKSON LEWIS P.C.

25 Dated: March 10, 2023

26 By: /s/ Asha J. Lopez
27 Carolyn G. Burnette
28 Asha J. Lopez
 Attorneys for Defendant
 FOUNDATION PARTNERS GROUP,
 LLC

ORDER

2 The Court having considered the Stipulation Regarding Deadlines filed by
3 Plaintiffs BRANDY OLMSTED, GENE PAUL NELSON, and NICOLE NELSON, and
4 Defendants FOUNDATION PARTNERS GROUP, LLC and ANDRES LOPEZ,
5 erroneously sued as ANDY LOPEZ, and other supporting evidence and papers, and
6 good cause appearing therefor,

IT IS HEREBY ORDERED that:

1. Fact Discovery in both actions shall be completed within 9 months from
the date that this Court signs this Order;
2. Designation of Expert Witnesses shall be due within 60 days after the
close of fact discovery;
3. Rebuttal Expert Witnesses shall be due by 30 days after the designation
of expert witnesses;
4. Expert discovery shall be completed by 120 days after expert witnesses
are designated; and
5. Dispositive motions shall be due within 180 days after the close of fact
discovery.

IT IS SO ORDERED.

Dated: March 15, 2023


MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE